

Exhibit A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence**A. U.S. Patent No. 8,406,733**

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
1	device agents	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'733 patent, at Abstract; Figs. 9-18, 21-26H, 27A-27P, 28A-28E, 29-40, 48, 51-55 (and associated text); 11:21-12:8, 15:58-16:26, 28:65-29:44, 34:4-67, 36:65-38:11, 39:1-54:36, 55:4-58:67, 59:59-60:16, 64:59-66:9, 68:19-71:59, 75:20-76:52, 77:31-46, 81:48-104:44, 108:48-111:10, 117:7-118:27, 120:59-121:28, 127:62-129:6, 132:64-135:21, 138:26-142:55, 145:33-148:39, 155:56-156:32, 158:22-160:14, and 161:53-162:54 (and associated Figures); claims 1, 9, 13, 19, 20, 23, 26, 27, 28, 30.</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, "View the device agent version," available at</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>'733 patent at 11:35-40, 11:65-66, 15:58-16:12, 42:48-43:7, 52:5-9, 56:52-53, 93:8-95:19, 160:7-8, 162:34-35, 162:47-48, Figs. 16-21, Figs. 22A-22B, Figs. 29-37</p> <p>12/380,780 prosecution history</p> <p>14/667,516 prosecution history</p> <p>15/211,430 prosecution history</p> <p>CA2786873 prosecution history</p> <p><u>Extrinsic Evidence</u></p> <p>Newton's Telecom Dictionary, 24th ed. (2008) at 95, Dictionary of Science and Technology, 2nd ed. (2007) at 20, Dictionary of</p>

		<p>https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definition for “agent.”</p>	Computer and Internet Terms, 10th ed. (2009) at 15, Expert testimony of Dr. Don Turnbull
2	wherein the particular device agent is configured to assist in presenting a notification through the user interface, the notification based on the message content	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’733 patent, at Abstract; Figs. 9-18, 21-26H, 27A-27P, 28A-28E, 29-48, 51-55 (and associated text); 7:39-11:10, 13:24-14:44, 15:58-16:26, 25:62-26:42, 28:65-29:44, 35:26-36:15, 37:36-54:36, 55:4-57:29, 65:40-66:9, 67:40-75:5, 82:39-84:9, 89:59-90:54, 95:30-96:52, 106:51-108:36, 110:54-113:15, 125:6-127:61, 127:62-129:6, 132:64-135:21, 138:26-142:55, 147:45-61, and 161:53-162:54 (and associated Figures); claims 1, 3, 9, 5-19, 20, 23-30.</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, “View the device agent version,” available at https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’733 patent at 50:42-59, 55:58-56:16, 71:60-72:31, 108:48-109:3, 118:61-119:43</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>

		Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definition for “agent.”	
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B. U.S. Patent No. 9,198,117

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
3	device messaging agents	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’117 patent, at Figs. 9-18, 21-26H, 27A-27P, 28A-28E, 29-48, 51-55 (and associated text); 11:21-12:8, 15:58-16:26, 28:65-29:44, 34:1-64, 36:62-38:7, 38:65-58:52, 59:55-60:12, 64:54-66:3, 68:12-71:51, 75:13-76:61, 77:31-46, 81:16-104:35, 108:32-111:5, 117:5-118:39, 120:59-122:17, 127:59-129:3, 132:59-135:16, 138:26-142:52, 145:29-148:36, 155:56-156:32, 158:22-160:14, and 161:53-162:53 (and associated Figures); claims 1, 4-7, 12-14, 18.</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, “View the device agent version,” available at</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’117 patent at 11:35-40, 11:64-12:3, 15:58-16:12, 42:48-43:7, 52:5-9, 56:52-53, 93:8-95:19, 160:7-8, 162:34-35, 162:47-48, Figs. 16-21, Figs. 22A-22B, Figs. 29-37</p> <p>12/380,780 prosecution history</p> <p>14/667,516 prosecution history</p> <p>15/211,430 prosecution history</p> <p>CA2786873 prosecution history</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>

		<p>https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definition for “agent.”</p>	
4	at least one of the devices having a network stack in communication with the device messaging agent, wherein the secure connection between the network message server and that device is terminated within the network stack	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’117 patent, at Figs. 7-18, 21-26H, 27A-27P, 28A-28E, 29-48, 51-55, 63, 64 (and associated text); 8:16-32, 11:21-12:8, 15:58-16:26, 16:27-17:37, 24:42-25:28, 26:42-27:30, 28:4-39, 28:65-29:44, 32:40-33:6, 34:1-64, 36:62-38:7, 38:9-64, 38:65-58:52, 59:55-60:12, 64:54-66:3, 67:34-68:11, 68:12-71:51, 73:32-74:46, 75:13-76:61, 77:31-46, 81:16-104:59, 108:32-111:5, 117:5-118:39, 120:59-122:17, 127:59-129:3, 132:59-135:16, 138:26-142:52, 145:29-148:36, 155:56-156:32, 158:22-160:14, and 161:53-162:53 (and associated Figures); claims 1, 4-7, 9, 11-14, 18.</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, “View the device agent version,” available at</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’117 patent at 55:67-56:5, 91:17-63, 93:55-60, Figs. 29-37</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>

		https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definitions for “agent,” “network,” “stack.”	
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C. U.S. Patent No. 9,615,192

Term No.	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
5	software components	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’192 patent, at Abstract; Figs. 9-18, 20-26H, 27A-27P, 28A-28E, 29-40, 46, 48, 51-55 (and associated text); 5:41-8:44, 9:51-10:64, 15:53-17:23, 27:1-45, 28:21-55, 29:64-34:55, 38:50-40:36, 43:1-44:30, 45:4-46:31, 46:32-48:46, 49:1-46, 50:56-51:63, 52:25-57:59, 60:49-64:29, 69:16-72:63, 73:36-75:62, 77:48-67, 85:9-87:49, 91:24-106:29, 110:42-112:50, 117:19-118:39, 128:21-53, 164:30-166:56, and 119:17-120:8 (and associated Figures).</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’192 patent 11:22-28, 15:53-16:7, 28:39-47, 43:18-46:31, 46:53-57, 94:45-96:59, Figs. 16-21, Figs. 22A-22B, Figs. 29-37</p> <p>12/380,780 prosecution history</p> <p>14/667,516 prosecution history</p> <p>15/211,430 prosecution history</p> <p>CA2786873 prosecution history</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>

		Knox Documentation, “View the device agent version,” available at https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/ ; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definitions for “agent,” “network,” “stack.”	
6	wherein one of the message delivery triggers is the receipt of a transmission on the respective secure message link from the device link agent of the given one of the wireless end-user devices, or a response generated to a transmission received from that device link agent	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>Abstract; Figs. 9-18, 21-26H, 27A-27P, 28A-28E, 29-48, 51-55 (and associated text); 13:40-14:35, 38:25-39:19, 48:12-30, 66:35-67:49, 69:65-70:30, 71:42-73:36, 75:62-77:25, 85:35-55, 90:5-51, 144:24-46, 145:40-146:41, and 149:44-151:16 (and associated Figures).</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, “View the device agent version,” available at https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definition for “agent.”</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’192 patent at 38:50-63</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>

7	<p>wherein one of the message delivery triggers is the receipt of a particular network element message from one of the network elements</p>	<p>Not indefinite; plain and ordinary meaning.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>Abstract; Figs. 9-18, 21-26H, 27A-27P, 28A-28E, 29-48, 51-55 (and associated text); 13:40-14:35, 38:25-39:19, 48:12-30, 66:35-67:49, 69:65-70:30, 71:42-73:36, 75:62-77:25, 85:35-55, 90:5-51, 144:24-46, 145:40-146:41, and 149:44-151:16 (and associated Figures).</p> <p><u>Extrinsic Evidence</u></p> <p>U.S. Patent Nos. 9,800,708; 10,506,090; U.S. Patent Appl. Pub. 2014/0135952; Samsung Knox Documentation, “View the device agent version,” available at https://docs.samsungknox.com/admin/efota-one/on-premises/settings-menu/view-the-device-agent-version/; Samsung SDS EMM Installation Guide (Jan. 2023); Microsoft Press Computer Dictionary (3d ed. 1997): definitions for “network.”</p>	<p>Indefinite.</p> <p><i>Supporting Evidence:</i></p> <p><u>Intrinsic Evidence</u></p> <p>’192 patent at 13:38-14:35, 38:25-39:19, 48:18-30, 66:35-67:4, 69:66-70:30, 72:14-63, 76:20-77:25, 85:35-55, 90:5-51, 144:24-46, 145:41-146:18, 150:8-151:61</p> <p><u>Extrinsic Evidence</u></p> <p>Expert testimony of Dr. Don Turnbull</p>
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